

## Comment Letter B49: Coalition for San Francisco Neighborhoods (7/11/2013)

1. This is a comment on the Regional Housing Needs Allocation (RHNA) conducted by ABAG pursuant to the Housing Element Law. While SB 375 requires that the Final RHNA plan be consistent with the region's adopted SCS, the RHNA process is different from the SCS process and the legal requirements of the Housing Element Law are different from SB 375. To ensure consistency between the two planning processes ABAG used the distribution of housing growth for the period from 2014-2022 in the Draft Plan as one of the factors in the RHNA methodology.

The commenter should note that as shown in Table 3.1-3 of the Draft EIR, under the No Project alternative San Francisco is expected to add 90,000 additional households through 2040. This population growth is expected to occur without the proposed Plan; see Master Response B.1 regarding the population projections. As the table also shows, the proposed Plan would place an additional 11,000 households in San Francisco. While this addition is substantial, note that 89 percent of the City's growth would occur regardless of the proposed Plan.

ABAG and MTC acknowledge the importance of increasing housing production and preservation in meeting the region's long term demand. Pursuant to SB 375, the SCS identifies "areas within the region sufficient to house all the population of the region, including all economic segments of the population ... ." (Gov. Code § 65080(b)(2)(B)(ii).) The SCS does so by producing a land use pattern sufficient to accommodate RHNA and through ABAG's and MTC's efforts to support additional affordable housing production. This includes Chapter 6 of the Plan, which identifies strategies for facilitating greater affordable housing preservation and production in the region. Many of these efforts require policy changes at the state or federal level that are beyond the control of the regional agencies, who will act as advocates for these changes. The regional agencies are providing more direct support for affordable housing through the Transit Oriented Affordable Housing (TOAH) fund, which supports affordable projects in Priority Development Areas and the identification of Affordable Housing as an allowable use for future Cap and Trade funds. Through these and other mechanisms, MTC and ABAG determined that of the 660,000 new housing units contemplated by the proposed Plan, 26 percent will be affordable to very low income households, 17 percent to low income households, 17 percent to moderate income households, and 39 percent to above moderate income households. (See Draft EIR, p. 1.2-53.) See also Master Response F, which addresses the issue of displacement in greater detail and identifies actions included in the Draft Plan to help address this challenge.

2. Plan Bay Area will have no legal authority to enforce the income levels of new housing units; such a request is an issue for the separate RHNA, see response B49-1. As noted in the Draft EIR, MTC and ABAG have no local land use authority; see Master Response A.1 regarding local land use control.
3. While MTC and ABAG agree that diversity is important, it is beyond the scope of their authority or even that of the RHNA to legislate diversity. See Master Response F regarding the proposed Plan's actions regarding displacement.

4. Chapter 2.7 of the Draft EIR analyzes seismic issues extensively. Pursuant to CEQA, the EIR focuses on potential environmental effects and identifies measures to minimize impacts to human health and the natural environment, not to reduce property damage.
5. This issue is analyzed under Impact 2.13-7 of the Draft EIR, which found that the improved transportation system efficiency, due to shifts away toward transit use, would result in a less than significant impact on impairing the implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan. This is a regional-scale, programmatic EIR, see Master Response A.3 regarding the level of specificity required of such an EIR. Specific impacts on San Francisco's emergency evacuation plans would be analyzed by the environmental impact analyses required of the future land development projects, land use plans, and transportation projects in and around San Francisco. See Master Response A.1 on local land use control, which allows the City to request modification of or to reject development proposals that interfere with its emergency response plans.
6. The location of hospitals in San Francisco is an issue beyond the scope of the proposed Plan, which is responsible for selecting regional transportation projects and proposing a generalized regional land development pattern to attain State-assigned GHG emissions reduction goals. The location of hospital beds is a local concern. See Master Response A.1 regarding local land use control.
7. See Chapter 2.12 which found adequate water supply for San Francisco based on the estimates of the SFPUC, which commented on the EIR and had the opportunity to make corrections; see responses to comment A25. Furthermore, the regional population growth is anticipated whether or not the proposed Plan is adopted. The proposed Plan attempts to mitigate the effects of this growth, it is not the cause of the growth. See Master Response G regarding water supply.
8. It is the responsibility of local wastewater treatment authorities, such as SFPUC, to ensure that wastewater and storm sewer conveyance systems are adequate to handle existing and proposed development, or they risk losing their federal NDPES permits which allow their operation. Mitigation Measure 2.12(d) in the Draft EIR calls on implementing agencies and/or project sponsors to undertake "environmental assessments of land use plans and developments to determine whether sufficient wastewater treatment capacity exists for a proposed project. These environmental assessments must ensure that the proposed development can be served by its existing or planned treatment capacity, and that the applicable NPDES permit does not include a Cease and Desist Order or any limitations on existing or future treatment capacity. If adequate capacity does not exist, the implementing agency must either adopt mitigation measures or consider not proceeding with the project as proposed." If this measure is followed, the implementation of the proposed Plan would not create a further environmental impact. That said, the periodic permit review process of the regional Water Quality Control Board should require SFPUC to reduce or eliminate raw sewage overflows.
9. It is noted that it is unlikely that San Francisco can increase the amount of open space available to its residents. Issues regarding the amount of open space will be addressed by local jurisdictions, who may charge impact fees to new development in order to improve the maintenance and operations of local parks, as noted in Chapter 2.14. Also note, as explained in response B49-1, that 89 percent of the City's anticipated growth would occur under the

No Project alternative. While the proposed Plan would add to that growth, the great majority of the impacts on the City's open space would occur regardless of the proposed Plan.

10. Local transit operations are beyond the authority of MTC and ABAG. As explained in response B27-3, however, the proposed Plan makes a substantial increase in funds flowing to local transit operations, upping transit operation and maintenance investments by \$48 billion from Transportation 2035 (the current regional transportation plan), to \$159 billion, representing a 43 percent increase in funding. This \$48 billion increase makes up 60 percent of the region's newly available transportation funds.